

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

UNITED STATES OF AMERICA	§	
V.	§	CRIMINAL NO. 3:21-CR-500-B
RAYMOND GROSS (02)	§	

UNOPPOSED MOTION TO CONTINUE

TO THE HONORABLE JANE J. BOYLE, UNITED STATES DISTRICT JUDGE FOR THE
NORTHERN DISTRICT OF TEXAS, DALLAS DIVISION:

COMES NOW the Defendant, RAYMOND GROSS, by and through undersigned
counsel and files this his unopposed motion to continue the trial date in this cause and all
corresponding pre-trial deadlines. In support of said motion, the Defendant would show unto the
Court as follows:

I.

The Defendant was indicted in a single count indictment with one count of Conspiracy to
Distribute a Controlled Substance in violation of 21 U.S.C. § 846, 841(a)(1) & (b)(1)(E). Doc.
12. The Defendant made his initial appearance in this jurisdiction on August 27, 2021 and was
appointed the undersigned as his attorney in this matter. Doc. 8. The case is currently set for trial
on December 20, 2021. Doc. 22. No previous continuances of the trial date have been sought in
this case.

II.

Since his appointment to this case, undersigned counsel has spoken with the Defendant
numerous times and discussed the case and the discovery in the case with the Government. The
Government has provided access to the discovery in this case which the undersigned would

describe as extensive as it totals multiple terabytes and includes video and audio files, extensive wire tap conversations, cell tower tracking records, bank records, reports, and other material. The undersigned's review of this material and subsequent work to prepare the best defense is continuing at this time and more time is needed in order to properly advocate for the Defendant. Therefore, even though undersigned counsel is working hard, additional time is needed in order to adequately and effectively represent the Defendant.

This continuance is requested so that undersigned counsel can review all the discovery in this case, fully investigate the case as needed, and conduct all necessary preparations and discussions with the Defendant in order to effectively provide representation in this matter. Given the length of this process as well as the perceived volume of discovery, undersigned counsel would request a continuance of 90 days. This continuance is requested not for purposes of delay but rather to protect the Defendant's rights to effective assistance of counsel and to avoid a miscarriage of justice. AUSA Beran has advised undersigned counsel that the Government does not oppose a continuance in this matter.

WHEREFORE, PREMISES CONSIDERED, the Defendant respectfully requests this Honorable Court to issue an order continuing the current trial setting and issue an order reflecting a continued trial date and appropriate corresponding deadlines.

Respectfully Submitted,

/s/ Paul T. Lund

Paul T. Lund
State Bar No. 24070185
900 Jackson Street
Founders Square
Suite 330
Dallas, Texas 75202
Phone: 214-871-4900
Fax: 214-613-1067

Attorney for Defendant
Raymond Gross

CERTIFICATE OF CONFERENCE

This is to certify that undersigned counsel conferred with Lindsey Beran, the Assistant United States Attorney in charge of this case who has advised that she does not oppose a continuance in this case.

/s/ Paul T. Lund

Paul T. Lund

CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing motion was delivered by ECF filing to Lindsey Beran, the Assistant U.S. Attorney assigned to this case on December 1, 2021.

/s/ Paul T. Lund

Paul T. Lund